

NEW YORK
LONDON
SINGAPORE
PHILADELPHIA
CHICAGO
WASHINGTON, DC
SAN FRANCISCO
SILICON VALLEY
SAN DIEGO
LOS ANGELES
TAIWAN
BOSTON
HOUSTON
AUSTIN
HANOI
HO CHI MINH CITY

DuaneMorris®

FIRM and AFFILIATE OFFICES

KELLY A. BONNER
DIRECT DIAL: +1 215 979 1158
PERSONAL FAX: +1 215 689 2198
E-MAIL: KABonner@duanemorris.com

www.duanemorris.com

SHANGHAI
ATLANTA
BALTIMORE
WILMINGTON
MIAMI
BOCA RATON
PITTSBURGH
NEWARK
LAS VEGAS
CHERRY HILL
LAKE TAHOE
MYANMAR
OMAN
*A GCC REPRESENTATIVE OFFICE
OF DUANE MORRIS*

ALLIANCES IN MEXICO
AND SRI LANKA

December 17, 2021

VIA ECF

The Honorable Thomas Vanaskie
Special Discovery Master
Stevens & Lee
1500 Market Street, East Tower, 18th Floor
Philadelphia, PA 19103

**Re: *In re Valsartan, Losartan, and Irbesartan Products Liability
Litigation*, Case No. 1:19-md-02875-RBK-KW**

Dear Judge Vanaskie:

We write on behalf of the ZHP Parties, and jointly with Plaintiffs, to report on the results of the parties' meet and confer with respect to the confidentiality designations for the documents attached to ECF Nos. 826, 967, 1189, and 1250, and the deposition testimony of Lijie Wang and John Iozzia (and the exhibits to those depositions) pursuant to Special Master Order ("SMO") No. 49 dated October 25, 2021, ¶ 2, (ECF No. [1667](#)) and SMO No. 52, dated November 8, 2021 (ECF No. [1731](#)).

December 17, 2021
Page 2

Since November 15, 2021, the parties have continued their meet and confer efforts regarding the challenged documents, and reached the following results:

- I. The ZHP Parties have agreed to de-designate the following thirty-nine (39) documents:
 1. ZHP01990527 (ECF No. 826, Ex. 26)
 2. ZHP00343422, 24 (ECF No. 826, Ex. 27)
 3. ZHP00324685 (ECF No. 826, Ex. 28)
 4. ZHP00352121 (ECF No. 826, Ex. 40)
 5. ZHP00358575 (ECF No. 826, Ex. 41)
 6. ZHP00325765 (ECF No. 826, Ex. 42)
 7. ZHP00337032 (ECF No. 826, Ex. 43)
 8. ZHP02493784 (ECF No. 826, Ex. 50)
 9. ZHP00827481 (ECF No. 826, Ex. 51)
 10. ZHP01893902 (ECF No. 826, Ex. 53)
 11. ZHP00310874 (ECF No. 826, Ex. 54)
 12. ZHP02125655 (ECF No. 826, Ex. 55)
 13. ZHP01976459 (ECF No. 826, Ex. 57)
 14. HUAHAI-US00008050 (ECF No. 826, Ex. 58)
 15. 4/22/2021 Tr. of Min Li Dep., 581:9-588:9, 589:20-598:7, 602:6-604:6 (ECF No. 1189, Ex. B)¹

¹ The parties have agreed to meet and confer on the confidentiality of the remainder of ECF No. 1189, Exs. B, E, and R.

December 17, 2021
Page 3

16. ZHP00076708 (ECF No. 1189 Ex. D)
17. 3/11/2021 Tr. of Hai Wang Dep. 411, 542:18-543:5 (ECF No. 1189, Ex. E)
18. PRINSTON00083641, 43-44, 47, 65, 73, 77 (ECF No. 1189 Ex. F)
19. PRINSTON00077850 (ECF No. 1189 Ex. G)
20. ZHP00004937 (ECF No. 1189 Ex. H)
21. PRINSTON00082995, 3000, 3002, 3010 (ECF No. 1189 Ex. I)
22. PRINSTON00074125-28 (ECF No. 1189, Ex. K)
23. PRINSTON00081549-53 (ECF No. 1189, Ex. L)
24. PRINSTON00081570-72, 74 (ECF No. 1189, Ex. M)
25. PRINSTON00162349, 73 (ECF No. 1189, Ex. P)
26. ZHP00494048 (ECF No. 1189 Ex. Q)
27. 4/16/2021 Tr. of Qiangming Li Dep. 341:7-17 (ECF No. 1189, Ex. R)
28. 04/5/2021 Tr. of Eric Gu Dep. 1, 25-30 (ECF No. 1189, Ex. Z)
29. ZHP00405108 (ECF No. 1189 Ex. BB)
30. ZHP01838590 (ECF No. 1189 Ex. DD)
31. ZHP02333049 (ECF No. 1189 Ex. EE)
32. PRINSTON0075797 (ECF No. 1189 Ex. FF)
33. PRINSTON00162349, 73 (ECF No. 1250, Ex. 4)
34. PRINSTON00083641, 43-44, 47, 65, 73, 77 (ECF No. 1250, Ex. 12)
35. PRINSTON00074125-28 (ECF No. 1250, Ex. 13)
36. PRINSTON00081549-53 (ECF No. 1250, Ex. 14)
37. PRINSTON00081574 (ECF No. 1250, Ex. 15)

December 17, 2021

Page 4

38. ZHP01761094 (ECF No. 1250, Ex. 23)

39. ZHP00667853 (ECF No. 1250, Ex. 24)

II. The ZHP Parties have proposed redactions to the following ten (10) documents, which Plaintiffs have accepted:

1. ZHP00325058-ZHP00325061 (ECF No. 826, Ex. 32)

2. ZHP02385356-ZHP02385360 (ECF No. 826, Ex. 33)

3. ZHP01937520-ZHP01937524 (ECF No. 826, Ex. 34)

4. ZHP00341377 (ECF No. 826, Ex. 36)

5. ZHP00309217-18 (ECF No. 826, Ex. 37)

6. ZHP00303912 (ECF No. 826, Ex. 38)

7. ZHP00351971 (ECF No. 826, Ex. 44)

8. ZHP00352112 (ECF No. 826, Ex. 45)

9. ZHP00000215-23 (ECF No. 1189, Ex. N)

10. SOLCO00180393 (ECF No. 1250, Ex. 11)

III. Plaintiffs are determining their positions with respect to the following four (4) documents to which the ZHP Parties have proposed redactions:

1. ZHP01907462-71 (ECF No. 826, Ex. 24)

2. ZHP00320441 (ECF No. 826, Ex. 39)

3. ZHP00076700 (ECF No. 1189, Ex. C)

4. PRINSTON00083027-28, 31, (ECF No. 1189, Ex. J)

IV. The parties agree that the following two (2) documents are confidential pursuant to the Court's May 24 Order (ECF No. 1269):

1. ZHP00306321 (ECF No. 826, Ex. 35)

December 17, 2021
Page 5

2. ZHP02579748-51 (ECF No. 1189. Ex. O)

V. The ZHP Parties have proposed redactions to the following forty-five (45) documents, which Plaintiffs have challenged, and which the ZHP Parties are reviewing to determine whether an amicable compromise can be reached as to the redacted exhibits:

1. ZHP00291951-53 and ZHP00292071 (ECF No. 826, Ex. 7)

2. ZHP01843070 (ECF No. 826, Ex. 8)

3. ZHP00016118 (ECF No. 826, Ex. 9)

4. ZHP00332358 (ECF No. 826, Ex. 10)

5. ZHP00332903-06 (ECF No. 826, Ex. 11)

6. ZHP01377830 (ECF No. 826, Ex. 12)

7. ZHP0249183 (ECF No. 826, Ex. 13)

8. ZHP01870979 (ECF No. 826, Ex. 14)

9. ZHP00021457 (ECF No. 826, Ex. 15)

10. ZHP01523949 (ECF No. 826, Ex. 16)

11. ZHP00088946 (ECF No. 826, Ex. 17)

12. ZHP0211463 (ECF No. 826, Ex. 18)

13. ZHP00671001 (ECF No. 826, Ex. 19)

14. ZHP00865176 (ECF No. 826, Ex. 20)

15. ZHP00865190 (ECF No. 826, Ex. 21)

16. ZHP00246515 (ECF No. 826, Ex. 22)

17. ZHP00271397 (ECF No. 826, Ex. 23)

18. ZHP02503597 (ECF No. 826, Ex. 25)

December 17, 2021
Page 6

19. ZHP01120762-ZHP01120776 (ECF No. 826, Ex. 29)
20. ZHP00320410-ZHP00320427 (ECF No. 826, Ex. 30)
21. ZHP00330625 (ECF No. 826, Ex. 48)
22. ZHP00072194 (ECF No. 967, Ex. A)
23. ZHP00120646 (ECF No. 967, Ex. B)
24. ZHP00120313 (ECF No. 967, Ex. C)
25. ZHP00120482 (ECF No. 967, Ex. D)
26. ZHP00063901 (ECF No. 967, Ex. E)
27. ZHP00122869 (ECF No. 967, Ex. F)
28. ZHP00122986 (ECF No. 967, Ex. G)
29. ZHP00122734 (ECF No. 967, Ex. H)
30. ZHP00125610 (ECF No. 967, Ex. I)
31. ZHP00126071 (ECF No. 967, Ex. J)
32. ZHP00137063 (ECF No. 967, Ex. K)
33. ZHP00063956 (ECF No. 967, Ex. L)
34. ZHP00137715 (ECF No. 967, Ex. M)
35. ZHP00139054 (ECF No. 967, Ex. N)
36. ZHP00141038 (ECF No. 967, Ex. O)
37. ZHP00146507 (ECF No. 967, Ex. P)
38. CHARLESWANG000289 (ECF No. 1189, Ex. T)
39. CHARLESWANG000318 (ECF No. 1189, Ex. U)
40. CHARLESWANG000355 (ECF No. 1189, Ex. V)

December 17, 2021

Page 7

41. CHARLESWANG000391 (ECF No. 1189, Ex. W)
42. ZHP01320376 (ECF No. 1189, Ex. AA)
43. SOLCO00033301 (ECF No. 1250, Ex. 9)
44. SOLCO00181380 (ECF No. 1250, Ex. 10)
45. ZHP00292153 (ECF No. 1250, Ex. 18)

VI. The parties agree that the following seven (7) documents are the subject of the ZHP Parties' pending motions, which are presently before the Court (respectively ECF Nos. 1629 and 1759):

1. ZHP00301611-17 (ECF No. 826, Ex. 52)
2. 4/20/2021 Tr. of Min Li Dep. 87:18-88:7 (ECF No. 1189, Ex. A)
3. 4/22/2021 Tr. of Min Li Dep. 588:10–589:18 and 598:9-602:4 (ECF No. 1189, Ex. B)
4. ZHP00190573 (ECF No. 1189, Ex. S)
5. PRINSTON00468994 (ECF No. 1250, Ex. 25)
6. ZHP02471924 (ECF No. 1250, Ex. 26)
7. ZHP02490581 (ECF No. 1250, Ex. 27)

VII. The ZHP Parties maintain their confidentiality designations as to the following fourteen (14) documents, as to which Plaintiffs maintain their confidentiality challenges:

1. ZHP02500007 (ECF No. 826, Ex. 49)
2. CHARLESWANG000026 (ECF No. 1189, Ex. X)
3. ZHP02324745 (ECF No. 1189, Ex. CC)
4. ZHP01662332 (ECF No. 1250, Ex. 1)
5. ZHP01633850 (ECF No. 1250, Ex. 2)

December 17, 2021

Page 8

6. ZHP01458548 (ECF No. 1250, Ex. 3)
7. ZHP02579748 (ECF No. 1250, Ex. 5)
8. SOLCO00012089 (ECF No. 1250, Ex. 6)
9. SOLCO00189499 (ECF No. 1250, Ex. 7)
10. SOLCO00025179 (ECF No. 1250, Ex. 8)
11. ZHP02385482 (ECF No. 1250, Ex. 16)
12. ZHP01423197 (ECF No. 1250, Ex. 17)
13. ZHP01224767 (ECF No. 1250, Ex. 20)
14. ZHP02666849 (ECF No. 1250, Ex. 28)

- VIII. The ZHP Parties have provided Plaintiffs with revised confidentiality designations for the deposition transcripts of Lijie Wang and John Iozzia, and will meet and confer with Plaintiffs regarding these designations. Additionally, the ZHP Parties are still deliberating as to the confidentiality of two exhibits to the Lijie Wang deposition—ZHP-72 and ZHP-78—and will apprise Plaintiffs of their position with respect to these exhibits.
- IX. The ZHP Parties will agree to de-designate those portions of ECF Nos. 826, 967, 1189, and 1250 consistent with their proposals as to the underlying exhibits.

We thank the Court for its courtesies and consideration of this report, and will submit a follow-up report following the parties' meet and confer regarding the deposition transcripts and exhibits for Lijie Wang and John Iozzia, as well as any outstanding disputes.

Duane Morris

December 17, 2021
Page 9

Respectfully submitted,

/s/ Kelly A. Bonner

Kelly A. Bonner

cc: Alan Klein, Esq.
Seth A. Goldberg, Esq.
Jessica Priselac, Esq.
Christopher Geddis, Esq.